EXHIBIT 39

Request Document

Business Requirements Document

Designate any requirements that do not apply to the request with N/A

Request Name:	6214: All Other Attorney Fee Practices (Phase 2)
Request Date:	June 2018

Project Sponsor:	Carmen Bell
Project Manager:	Heather Pemble
Assigned Analyst:	Travis Hutzell, Adam Alvarez, Mike Agocs
Requestor:	Carmen Bell
Business Unit:	Loss Mitigation
Request Type:	C2C Issue Review and Remediation

Approvals

The requirements document will be approved by CEDA management. The analytical manager will sign off on the analytical process. The business will sign off on the high-level project.

Name	Project Role	Date Approved	Approval Documentation
Heather Pemble	CEDA Analytics Manager		
Bill Pinkerton	Senior Leader		
Brian Spensley	Executive Sponsor		
Kara Reimers	Business Lead/SME		
Brian Dietz	RECOR		
Jason Depino	Project Team Lead		
Mike Jacoby	Ops Risk Manager		

Version History

For each iterative change, create a new row and key in the description to contain all of the changes for that specific version. Each time the requirements document requires a new approval, a new version number in the Version History is required.

Version #	Revision Date	Revised By	Change Description
01	8/13/2018	Mike Agocs	Initial Draft
02	9/21/2018	Mike Agocs	Updates to waterfall

Purpose

The request purpose is to define the reason for the requested work; include the issue and how the request will address the issue. Utilize the CIRT tool or the Comprehensive Commitment to Customer Plan (if retail) to pull in the background information. CIRT Details:

- Issue – found on the discovery screen, details section
- Root Cause Summary – found on the research screen
- Short Term Solution – found on the discovery screen → Details → Immediate Corrective Action
- Long Term Solution – found on corrective action screen – likely will not be completed initially

CEDA objectives will need to be added based on the waterfall approach.

Background and Objective(s):	**Incident Description.**
	The Bank committed to reviewing all other attorney fee practices carried out in the decisioning tools and products not impacted by the 6214 Phase 1 issue. The time period reviewed was between April 2010 and

April 2018. Many of these accounts went through the loan modification process several times so there was 207,705 accounts for a total of 958,094 records. This review compared what fees were invoiced and paid vs. quoted from the attorney and validate if the amount of quoted fees used in the modification decision went over the allowable amount and could have changed a modification denial to an approval. Based on this review, the Bank initially determined that 203,294 accounts were not impacted by the calculation error for various reasons; for example, due to investor rules, accounts that were not eligible for certain loan modification products; the property was ineligible for a loan modification because it was a second home or not the borrower's principal residence; the borrower received a subsequent loan modification; or, where the data reflected that the fees did not impact the decision.

The 4,411 remaining accounts underwent a manual review to determine if the calculation error caused the loan to be denied or deemed ineligible. Of these accounts, 200 were determined to have been incorrectly denied or deemed ineligible when they should have been approved and offered a loan modification.
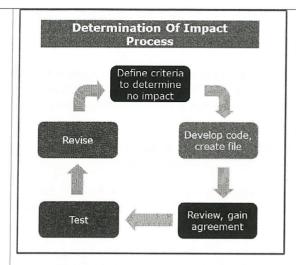
Customer Impact.
Customers may have been inappropriately denied for Home Preservation home retention products and for HAMP decisions, this may have included loss of related incentives.

Additional Background – From CEDA Data Discovery

- April 2010 – April 2018 including all products that were not included in the initial HPA calculation error review
- Investors included:
    - FHA (all products, SLoaD)
    - VA (all products, HPA)
    - GSE (RPP & Flex Mod, HPA and SLoaD)
    - Wells Owned/B&P (Repayment Plan only, HPA)
- At the time of a modification review, if a loan had been activated in Foreclosure, the Underwriter would utilize a quote from the foreclosure attorney for any fees and costs they had incurred, but not yet sent an invoice for payment.
- The Underwriter would add this figure into the decisioning tool to include the additional expense in the modification review.
- There was no check by the Underwriter to validate the quote from the attorney was within the investor allowable amount based on the property's state.
- At no time was the customer charged a fee they shouldn't have been.

The project team's goal was to identify decisions, using data, that were not impacted by attorney fees. In order to accomplish that task, we followed the process illustrated below where we attempted to identify all loans/decisions that were not impacted by attorney fees. Throughout the process, the project team had 1) credible challenge meetings and 2) working sessions with the business to define new criteria. After all the data options were considered, there were still loans/decisions that needed to be manually reviewed to determine if there was impact.

CEDA Objectives
Primary Objective

- Identify all loans/decisions (customers) that could have been denied a loan modification (i.e. impacted) because the amount of quoted fees used in the modification decision went over the allowable amount.

Waterfall Methodology Description:	**Waterfall to identify customers that were not impacted:**

1. **Loans with $0 Pending Fees** – No attorney fees were used in determination of eligibility for a loan modification.

2. **Product Specific Exclusions** - Included all products that were not reviewed in the initial HPA calculation error review.

3. **Denial Reasons Not Impacted** - Any Denial Reason not impacted by attorney fees.

4. **Subsequent Modification Approval** - Any loan that had a modification approval for a retention solution on or after the day the denial decision was committed is not considered to be impacted. This follows precedent established in prior remediation efforts.

5. **Loans with a Subsequent Long Term Modification** - Any loan that had a retention modification completion after the day the denial decision was committed is not considered to be impacted. This follows precedent established in prior remediation efforts.

6. **Eligibility Messages** - Any Eligibility Message that was not impacted by attorney fees.

7. **Special FB RPP + HTI Evaluation** - Any Special Forbearance RPP record with a pre mod HDTI value > 31% **OR** any Special Forbearance RPP record with a pre mod HDTI value < 31% and we've recalculated their total arrearage fees with the pending RECO fees removed and compared to policy

8. **Eligible FHA Products + F/C Referral** - Any FHA product that had a f/c referral step code present at the time of the decision and the f/c sale had not been completed; per policy 75% of the state fee matrix amount is allowed – we compared what was entered on DDCH and the Pending fees against the 75% amount to deem no impact.

9. **Eligibile FHA/FNMA Products + Att Schedule Compare** - Any FHA/FNMA product in which we look for

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specific foreclosure events (Examples: 3rd Party Funds Sent to Servicer, FC Deed Recorded, Publication Commenced, etc.) and determine the % of the state fee matrix amount was allowed to be charged and compare to what was entered on DDCH + the Pending RECO fees to deem no impact.

10. **B&P RPP + Pre Mod HTI & Corrected HTI Evaluation** - Any B&P Repayment Plan denial with a pre mod HTI > 38% **OR** any B&P Repayment Plan denial with a pre mod HTI <= 38% and we've removed the attorney fees from the total capitalized amount paid and recalculated their post mod HTI value to deem no impact.

11. **FHA Loan Mod & Corrected PITIS Evaluation** - Any FHA Loan Modification denial with a correction to the PITIS by removing the fees and comparing to investor guidelines value to deem no impact.

12. **VA HAMP HTI Pre Mod** - Any VA HAMP denial where the HTI pre modification was less than 31% **OR** when the HTI pre modification was >= 31% and we've recalculated their post mod HTI with the fees removed and compare to policy to deem no impact.

13. **FHA HAMP + Corrected HTI** - Any FHA HAMP denial and we have recalculated their post modification HTI value with the fees removed and compare to policy to deem no impact.

14. **VA Traditional Mod Surplus Review** - Any VA Traditional Mod denial where we have recalculated their UPB with the fees removed and then re-amortized their payment and added in taxes, insurance, HOA, and escrow shortage in addition to their monthly expenses and compared to their monthly income to understand the surplus to deem no impact.

15. **VA Proprietary + Corrected HTI** - Any VA Proprietary Modification denial where we have recalculated their post modification HTI with the fees removed and the value was greater than or equal to 41% **OR** the recalculated post mod HTI value was less than 41% but the difference from the pre mod to post mod valuation was less than a 5% decrease to deem no impact.

16. **VA Affordable Mod + HTI Pre Mod Review** - Any VA Affordable Mod denial where the HTI pre modification was less than 31% **OR** when the HTI pre modification was >= 31% and we've recalculated their post mod HTI with the fees removed and compare to policy to deem no impact.

17. **VA Refund Surplus Review** - Any VA Affordable Mod denial where the HTI pre modification was less than 31% **OR** when the HTI pre modification was >= 31% and we've recalculated their post mod HTI with the fees removed and compare to policy to deem no impact.

18. **RPP + Monthly Delinquency Payment Compare** - Any RPP denial that had one penny as the attorney fees **OR** any RPP denial that we removed the recoverable fees from the capped total amount repaid and then compared to a payment threshold via investor guidelines to deem no impact.

Goals:	Identify customers that were impacted so they can be remediated.
Use / Tactics:	This sizing effort will identify all customers affected by this issue to include in remediation efforts.
Benefits *(cost savings, enhance revenue, higher productivity, improved compliance, better decision making, etc.)*:	Expanding the scope of the identification efforts will ensure that all affected customers are identified and are remediated if applicable. Will result in increased customer satisfaction through reduced complaints and phone calls.

Requirements

In Scope:	• HPA

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	• SLoaD • Dates of April 2010 – April 2018 • All committed decisions from HPA and SLoaD prior to May 2018 and the final decision in the occurrence of the committed review was a denial. • This effort was based on a decision level review (not at loan level). Therefore, each loan could have one or more decisions.
Out of Scope:	• All other decisioning tools based on reviews of coding and requirements documents. • Validating the accuracy of the HPA and SLoaD tool functionality beyond attorney fee calculation.
Considerations	• Estimated attorney fees were added to the modification decision within the tool logic, **not actually charged to the customer's account**. No fees were inappropriately charged to customers and therefore are not a consideration for this review.
Due Date:	September 2018
Frequency:	One Time Analysis
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Output Format:	Various Documents provided in share folder
Contain Secured Data:	
Communication Plan:	Present findings to business partners

Business Requirements

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Date: The date the requirement is entered into this Request Document
Requirement Type: The category to which the requirement belongs (Data, Inclusion, Exclusion, Calculation, Metric, Process, Training, Documentation, or Compliance)
Requirement Description: A complete description of the requirement
Rationale: Why this requirement is necessary

[HYPERLINK "file:///\\\\wfsiadmnsf21\\c_mtgbcd_groups\\DDET"] that contains:

- BRD
- Code for Waterfall Criteria
- One page summaries of each waterfall criteria (including examples/screen shots)
- Testing Documentation
- Data Mapping

Legal Documents & Attachments

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